

DOCKETED

Docket Number:	18-SOLAR-01
Project Title:	Solar Equipment Lists Program Implementation
TN #:	249164
Document Title:	City of Ames Comments - Solar Equipment Lists RFI
Description:	N/A
Filer:	System
Organization:	City of Ames
Submitter Role:	Public Agency
Submission Date:	3/15/2023 1:22:08 PM
Docketed Date:	3/15/2023

*Comment Received From: City of Ames
Submitted On: 3/15/2023
Docket Number: 18-SOLAR-01*

Solar Equipment Lists RFI

Additional submitted attachment is included below.

Request for Information

Feedback is requested on the questions below. Stakeholders are not required to respond to every question in this request for information (RFI) but are encouraged to respond specifically to those questions closest in line with their knowledge and experience.

1. What entity, if any, do you represent or are you affiliated with?

City of Ames, Electric Services (Iowa)

2. What is your/your organization's primary use of the Solar Equipment Lists?

Determining equipment that is Rule 21 compliant.

3. How often do you download or reference the Solar Equipment Lists from the Solar Equipment Lists website at

<https://solarequipment.energy.ca.gov/Home/Index?>

d. Other - please explain: **As needed, when new equipment manufacture's equipment is proposed for a system that we have not seen before. Probably a few times a year**

4. Please provide information on how the Solar Equipment Lists assist you/your organization with everyday business needs:

i. How do they integrate with your operations?

ii. How would you describe the value of the lists to your efforts?

iii. If applicable, approximately how many interconnection applications/permits to operate do you process, on a monthly basis, using the data on the Solar Equipment Lists?

5. Roughly how much time do you save on a weekly or monthly basis by using the data on the Solar Equipment Lists, as opposed to not having the lists as a reference?

6. Is there a format that would improve the effectiveness of the lists or ability to use them?

7. Can you substitute the data from the Solar Equipment Lists with another data source? How would your program(s) be impacted without this resource?

8. As an equipment manufacturer (if applicable), what are the benefits of having your equipment listed on the Solar Equipment Lists?

9. Please share any other feedback you would like us to consider:

Ames is primarily looking for certification that listed equipment complies with the requirements of Rule 21, however it was determined this past year that the listing process is not as technically rigorous as we thought. We found that for one of the listed inverters, the manufacture was unfamiliar with Rule 21 settings requirements, so we have had to provide more education to at least one of the listed manufactures about what the settings requirements are.

There also seems to be a disconnect between CEC and actual inverter settings in that inverter settings and performance requirements are not listed on the CEC site; the listing of inverter performance requirements appears to rely on the Rule 21 Tariff language published by each of the Investor-Owned Utilities.

My specific recommendation is for the CEC to document and post on its website a Source Requirements Document for inverters and Battery (ESS) systems, so that it is clear what requirements this equipment is certified to.

I saw this SRD referenced on the inverter listing request form.

<https://www.energy.ca.gov/media/3899> you will see it under this section:

Safety Certification to UL 1741 (including Supplement SA)
Is the test lab a Nationally Recognized Testing Laboratory (NRTL) whose Scope of Recognition under the Occupational Safety and Health Administration (OSHA) includes UL 1741? ^[1]
Is the UL 1741 certificate of compliance (or Authorization to Mark) from a NRTL and for the requested inverter model number(s)?
Does the UL 1741 certificate of compliance for the requested inverter model number(s) include Supplement SA?
Was compliance with the current California Rule 21 Source Requirement Document (SRD) confirmed by the tests?
<input type="radio"/> Identify compliance with any other SRDs:
Was the Volt-VAr curve tested with <u>reactive power priority</u> enabled during testing in accordance with UL 1741, Volt-VAr (SA13)?
In which submitted document(s) does the <u>NRTL verify</u> that the Volt-VAr test (SA13) was done with reactive power priority enabled?

Also—the CEC’s listing process should require certification/testing to the CA rule 21 SRD. Otherwise, what value is the listing?
